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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE HONORABLE BOARD OF PATENT APPEALS AND INTERFERENCES

In re the Application of

Chi-Thanh DANG et al.	Group Art Unit: 2176
Application No.: 09/859,425	Examiner: P. SMITH
Filed: May 18, 2001	Docket No.: 109444

For: SYSTEMS AND METHODS FOR DYNAMIC NATIONAL LANGUAGE SERVICE

REPLY BRIEF

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

The following remarks are directed to the new points of argument raised in the

Examiner's Answer dated August 12, 2005.

In the Examiner's Answer, the Examiner has withdrawn the rejection of claim 21

under 35 U.S.C. §101. The Examiner has maintained the rejection of claims 1-21 under 35

U.S.C. §103 (a) over U.S. Patent No. 6,421,733 to Tso in view of U.S. Patent No. 6,073,147

to Chan.

In responding to the Appellants' arguments, the Examiner continues to improperly

characterize the teachings of Chan to remedy the deficiency of Tso and to improperly

combine the teachings of Chan with the teachings of Tso with respect to the pending claims.

A.   **Chan does not remedy the deficiencies of Tso.**

The Examiner alleges that Chan maintains both graphical and text forms of characters

at a server as shown in Fig. 2 and conditionally provides the appropriate graphical or text

character upon request from the client computer. However, the system Chan does not store graphical and text forms of characters at a server. Chan teaches a font resource distribution system that stores "information which describes each character in the font." See Chan at col. 3, lines 34-36. In other words, the font resource server of Chan stores and provides the necessary information pertaining to the various types of fonts that may be required by users to generate characters present in a document. Although the information may describe the characters of a font in multiple formats, such as a bitmap form and an outline form, the information for generating characters, not the characters themselves, is stored according to Chan. See Chan at col. 2, lines 5-22.

The Examiner alleges that the bitmap character form mentioned by Chan is a graphic form of a character and the outline form is a text form of a character. More specifically, the Examiner alleges that at col.3, lines 38-40, Chan discloses that in bitmap form, the value of each pixel in a block of pixels is specified, to define a rasterized image. The Examiner alleges at col. 3, lines 41 and 42, that Chan discloses that in outline form, the shape of the character is defined by certain points on its periphery. The Examiner concludes that Chan thus discloses a server which can provide a client with either a graphical content representation or textual content representation of a character or set of characters as is needed by a client computer.

However, the bit-map and outline formats of Chan only differ in how each format defines a character, i.e., the same element. See Chan at col. 3, lines 37-41. That is, the font server of Chan selectively employs a bit-map format or an outline format for information to generate a character. See Abstract of Chan. Nowhere does Chan disclose using both formats, let alone using both formats to represent multiple versions of the same element. Thus, the bit-map and outline formats are not versions of each character, but are only information for generating each character using such formats.

Furthermore, because the bit-mapped and outline formats of Chan are only

information related to a font, neither of the formats provide a graphical content element, as

recited in the independent claims. Graphic content elements as recited in the independent

claims are not only information, but are graphic files. Graphic content elements are generated

for content elements associated with pictographic languages such as Japanese, Chinese,

and/or Korean and may be may be incorporated into Internet graphic format "png" files or any

other supported graphic file format. See specification at paragraph [0013] and Fig. 9. Thus,

Chan does not disclose the graphical content elements, as recited in the independent claims.

B.   The asserted combination of Tso and Chan is improper.

The Examiner further alleges that a combination of Tso and Chan would have

rendered the pending claims obvious to one of ordinary skill in the art at the time of

invention. The Examiner alleges that dynamic translation and content replacement are

entirely taught by Tso. The Examiner asserts that Chan provides the additional teaching that

enables Tso to replace a language content with a translation that is composed of either a

graphical content or a textual content as is required by the client computer. More specifically,

the Examiner asserts that the server in Chan provides a client computer with an appropriate

graphic or textual character resource so that the client computer can then display the character

appropriately. The Examiner further alleges that the teachings of Chan, when combined with

Tso, would have enabled dynamic language translation, which would have translated original

content elements into either corresponding translated graphical content elements or

corresponding translated textual content elements.

However, any permissible combination of the teachings of Tso and Chan would not

result in the modification alleged by the Examiner's Answer. As discussed above, Chan does

not teach storing both graphical content elements and textual content elements, and thus Chan

cannot supply the feature of claim 1 admittedly missing from Tso, even if the font

information (resources) of Chan were to be stored in the same memory.

Furthermore, absent impermissible hindsight based on Applicants' claims, there is no

motivation to combine Tso with Chan. The Examiner alleges that it is a risk that a translation

might produce characters that the client computer may not be able to display, since Tso

specifically teaches a transcoding server which dynamically translates a document for a

original language to a translated language. The Examiner further alleges that the teachings of

Chan significantly improve the dynamic translation taught by Tso by providing necessary

graphical or textual content elements to the client computer for elements that the client

computer cannot otherwise display.

However, the alleged modification would render the prior art invention being

modified unsatisfactory for its intended purpose, and thus there is no suggestion or motivation

to make the proposed modification. The disclosed advantage of the font server of Chan is to

reduce transmission time and memory requirements. See Abstract of Chan. That is, the

server of Chan reduces transmission time and memory requirements as a result of smaller

document files, because the server of Chan allows a user to display and print documents

containing any of a large variety of fonts, without requiring font resource data to be included

in a file with the document. See Chan at col. 4, lines 10-52.

The system for managing dynamic translation merges the translation from a language

table storage into the received content portion. See Fig. 9. The language table storage

requires memory to store the translation of each of the skeleton requirements. Thus, the

proposed modification would increase memory requirements. Because the specific intended

purpose of the font server of Chan is to reduce memory requirements, Chan teaches away

from the combination and modification asserted.

As Tso and Chan fail to teach or suggest all of the features of each of the independent claims and the required motivation to combine is lacking, Appellants respectfully submit a *prima facie* case of obviousness has not been established.

C.   Conclusion

For all reasons stated in the Brief on Appeal, as well as the additional reasons set forth above, Appellants respectfully request this honorable Board to reverse the rejection of claims 1-21.

Respectfully submitted,

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